1 2	THOMAS A. COLTHURST (CABN 9949) Attorney for the United States Attorney Acting Under Authority Conferred by 28 U.S.C. § 515		
3	KATHERINE L. WAWRZYNIAK (CABN 252751) Chief, Criminal Division		
4 5 6 7 8	ROBERT S. LEACH (CABN 196191) ADAM A. REEVES (NYBN 2363877) Assistant United States Attorneys  450 Golden Gate Avenue, Box 36055 San Francisco, California 94102-3495 Telephone: (415) 436-7014 Fax: (415) 436-7234		
9	Email: Robert.Leach@usdoj.gov		
0	Attorneys for United States of America		
1	UNITED STATES DISTRICT COURT		
2	NORTHERN DISTRICT OF CALIFORNIA		
13	SAN FRANCISCO DIVISION		
4	UNITED STATES OF AMERICA, ) Case No. CR 18-577 CRB		
15	Plaintiff, STIPULATION AND [PROPOSED] ORDER		
	v. )		
l6 l7	MICHAEL RICHARD LYNCH AND STEPHEN KEITH CHAMBERLAIN,		
8	Defendants.		
9			
20	<u>STIPULATION</u>		
21	The parties, through their respective counsel, stipulate and agree that the existing protective		
22	order (Dkt. 54) shall apply to Defendant Lynch, his attorneys, and members of his defense team. The		
23	parties further stipulate and agree that attorneys for Defendant Chamberlain may share documents		
24	received from the government in this matter with attorneys for Defendant Lynch, and vice versa, and		
25	that such documents shall be treated consistent with the existing protective order. The parties		
26	respectfully request that the Court issue an order to this effect.		
27	IT IS SO STIPULATED.		
28	STIP & [PROPOSED] ORDER CASE NO. CR 18-577 CRB 1		

## Case 3:18-cr-00577-CRB Document 179-1 Filed 06/16/23 Page 2 of 4

1 2	Att	OMAS A. COLTHURST orney for the United States Attorney ting Under Authority Conferrred by
3		U.S.C. § 515
4		
5	By:	Robert S. Leach
6		ROBERT S. LEACH ADAM A. REEVES
7		Assistant United States Attorneys
8	DATED A 16 2022	
9	DATED: June 16, 2023 STI	EPTOE & JOHNSON LLP
10		
11	By:	REID H. WEINGARTEN
12		JONATHAN MATTHEW BAUM
13		BRIAN M. HEBERLIG MICHELLE L. LEVIN
14		NICHOLAS PAUL SILVERMAN Attorneys for Defendant
15		Michael Richard Lynch
16	DATED: June 16, 2023 CL	IFFORD CHANCE US LLP
17	DATED: Julie 10, 2023	II I ORD CHAIVEL OS LLI
18		
19	By:	CHRISTOPHER J. MORVILLO
20		CELESTE KOELEVELD DANIEL SILVER
21		Attorneys for Defendant
22		Michael Richard Lynch
23		
24		
25		
26		
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28	STIP & [PROPOSED] ORDER CASE NO. CR 18-577 CRB	2

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1	DATED: June 16, 2023	BIRD, MARELLA, BOXER, WOLPERT, NESSIM,
2	5111551 valie 10, 2023	DROOKS, LINCENBERG & RHOW, P.C.
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4		By: /s/
5		GARY S. LINCENBERG RAY S. SEILIE
6		MICHAEL C. LANDMAN Attorneys for Defendant Stephen Keith Chamberlain
7		Attorneys for Defendant Stephen Rettir Chamberlain
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40	STIP & [PROPOSED] ORDER	3

[PROPOSED] ORDER Pursuant to stipulation and good cause shown, the Court ORDERS that the existing protective order (Dkt. 54) shall apply to Defendant Lynch, his attorneys, and members of his defense team. Attorneys for Defendant Chamberlain may share documents received from the government in this matter with attorneys for Defendant Lynch, and vice versa. Such documents shall be treated consistent with the existing protective order. IT IS SO ORDERED. Date: THE HONORABLE CHARLES R. BREYER UNITED STATES DISTRICT JUDGE